

**OFFICE OF THE TECHNICAL COMPLIANCE ADVISOR
WORLD CENTER PLAZA, OFFICE 1001
SAN JUAN, PUERTO RICO, 00918**

INTRODUCTION:

Pursuant to Court Order in Case 3:12-cv-02039 (GAG), Docket No. 700, filed 01/13/18, the Technical Compliance Advisor assigned Mr. Scott Cragg (Information Technology SME for TCA) to perform a cursory assessment of Puerto Rico Police Departments existing Time and Attendance, hereinafter T&A, processes and processing equipment between January 22 and 25, 2018.

PURPOSE OF ASSESSMENT AND METHODOLOGY:

Interviews were conducted with Puerto Rico Police Department HR, Bureau of Technology and Reform staff, IT support staff at the Commandancia Guayama and with the HR contractor (Interboro) performing IT development. The purpose of the Assessment is to establish a baseline from which to make initial recommendations regarding a way forward for PRPD to develop a world class time keeping system for Puerto Rico Police Department.

Initial observations:

Puerto Rico Police Department currently employs a Time & Attendance information technology system (Kronos) for time keeping. Given its present capabilities, employees use the system to record arrival and departure from their duty stations utilizing a thumb print reading clock connected via the internet to a Headquarters server that processes the data. Unfortunately at this time, as result of the hurricanes and damage to fiber networks Kronos is not 100% available to Puerto Rico Police Department staff. When functioning, total hours worked are recorded and used to calculate "regular" attendance hours for the purpose of computing base pay. **Although total hours collected could reconcile overtime hours in excess of regular hours, the PRPD does not currently use the feature.** And so although the T&A system is currently being adapted to incorporate additional capabilities, workaround manual processes are used that require manual supervisory involvement to validate and approve T&A. An example of this is manual use of hard copy Form PPR-432 to record, approve and submit overtime hours worked. **Observation:** This process is inefficient, can be cumbersome, is not timely and deviates from what should be a computer or smartphone enabled "end to end" timekeeping workflow similar to those found in many Federal Agencies.

Additional Issues:

Complicating issues surrounding time keeping include the following:

1. network disconnects due to the hurricanes
2. de-coupled training from the development schedule of Kronos
3. failure of supervision to adequately ensure that time keeping procedures are followed and
4. incomplete training.

Opportunity:

To fully comply with the mandate of Hon. Gustavo A. Gelpi, U.S.D.J., Puerto Rico Police Department is in a position to revise its workflows and technology tools to dramatically improve time keeping processes. These could include methods such as incorporating cloud service providers of time keeping records and broader deployment of mobile smartphone applications and web tools, etc.

Recommended Course of Action:

1. Complete the current PPR-432 development phase to digitally replace form PPR-432, perform testing, suspend further development and gather lessons learned.
2. Prepare an Analysis of Alternatives (AOA) and rough order magnitude resource and cost estimates to perform items 2-4 below. To accomplish this task, subject matter expert resources should be applied to complete this step 2: Estimated resources needed - Project Lead and Solution Architect 120 Hours, deliver AOA no later than 6 weeks after approval to start. This is a required planning step necessary to understand options.
3. If the AOA is accepted, further develop the step 2 alternatives into a comprehensive project plan incorporating lessons learned from prior experiences with Kronos. Consideration must be given to a Cloud Service implementation of time and attendance "punch", supervisory review, HR and Payroll processing through a fully digital process that also incorporates mobile and fixed "clock punch" tools such as smart phones. This project plan must include a projection of estimated resources to implement, a procured service which Puerto Rico Police Department does not have to maintain itself and which it could benefit from by not having to procure IT infrastructure or processing equipment. This planning must result in an advanced technology architecture for T&A. Cost and Schedule to be estimated after step 2 and before step 3 start. This step requires review and approval. This is a planning step.

4. If step 3 is approved, implement the project plan option to re-design T&A processes for staff and supervision. This step requires approval and a commitment of budget resources and staff. Cost and schedule to be calculated after step 3. This is an implementation step where the majority effort and cost will be incurred.
5. Operationalize the future state “Cloud” solution for delivery of T&A. This step requires approval and budget resources. This will be an implementation step that requires recurring support and licensing costs.

Note: The above 5 phases are intentionally sequenced to allow for the Court, USDOJ and PRPD to review and assess options, probability of success and to mitigate risk factors. Specifically, phase 3 is intended to develop a comprehensive plan that not only includes technology in the solution but also the impact to PRPD staff currently performing support functions in both time keeping and IT maintenance. Rigor in this phase must also explain the benefits of proceeding with step 4.